

Steven Rader

From: Brian C Crawford <brian@trustwilliams.com>
Sent: Wednesday, March 23, 2022 8:29 AM
To: Akiva Cohen; Steve Brauerman
Cc: Steven Rader; John L Williams; Jason Dilday; Thomas Stephens
Subject: Re: BCV, Inc. v. Chanbond, LLC, C.A. No. 1:21-cv-01456-MN

Mr. Brauerman and Mr. Cohen,

Rule 7.1.1. provides for a meet and confer to make reasonable efforts during oral communications to see if the parties can come to an agreement. It does not require we pre-brief responses to your clients' objections in response to Rule 11 threats.

With regard to Mr. Brauerman's request for an extension, we are always agreeable to reasonable extensions as such is to be expected of Delaware lawyers. In other contexts, Steve Director, Esq. Marla, Norton, Esq. Pete Ladig, Esq. and Kara Swasey, Esq. from your firm can attest John L. Williams, Esq. and I do our best to maintain Delaware civility. It makes sense not to run the clock on responses and replies until after the parties have had a chance to meet and confer and submit the Rule 7.1.1. Statement. We can discuss response deadlines at the meet and confer.

Furthermore, we are complying with the Court's direction on the docket to comply with L.R. 7.1.1. but do not waive our position that, as a non-party filing a motion, our clients are not bound by L.R. 7.1.1. In another case, Judge Noreika granted a motion to intervene without a Rule 7.1.1. Statement as recently as February 1, 2021 in C.A. No. 18-503. Mr. Brauerman, we note you apparently took a similar position when you filed a motion to intervene in 1:17-cv-01323-SB without a L.R. 7.1.1. statement.

We believe that further e-mails regarding this motion to intervene other than scheduling teleconferences are unnecessary. We still plan to be on the conference line at the times identified in our letter to the Court. We look forward to our telephone communications to be conducted with Delaware civility.

Yours truly,

Brian

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